

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DINO ANTOLINI,

Case No.: 1:19-cv-09038

Plaintiff,

vs.

AMY MCCLOSKEY, THERESA LAURENT,
DIMUR ENTERPRISES INC., EDDIE C K CHUNG
and C&S MILLENIUM REAL ESTATE LLC,

Defendants.

NOTICE OF MOTION TO
TERMINATE THE DEPOSITION
OF PLAINTIFF

PLEASE TAKE NOTICE, that upon the annexed affirmation of Stuart H.

Finkelstein, Esq. dated May 14, 2021 and the exhibits annexed thereto, Plaintiff Dino Antolini, by undersigned counsel, will move this Court, before Magistrate Stewart Aaron of the United States District Court, located at the Daniel Patrick Moynihan United States Courthouse 500 Pearl St. New York, NY 10007, at a date to be determined by the Court, pursuant to Federal Rule of Civil Procedure Rule 30(d), Rule 30(d)(2), Rule 30(c)(2), Rule 30(d)(3), and Rule 26(c)(1) for an order terminating any further deposition of Plaintiff DINO ANTOLINI by defendants, on the grounds that such examination is being conducted in bad faith, and in such manner as unreasonably to humiliate, embarrass and oppress the deponent, and further, precluding the deposition at time of trial, striking the ANTOLINI transcript from the Court docket, and pursuant to Fed. R. Civ. P. 37(b)2, Fed. R. Civ. P. 16(f), 28 U.S.C. § 1927 and/or the inherent powers of the Court, for monetary sanctions and attorney's fees.

Dated: Syosset, New York
June 7, 2021

Respectfully submitted,

by: /s/
Finkelstein Law Group
STUART H FINKELSTEIN, ESQ.
Attorney for Plaintiff
338 Jericho Turnpike
Syosset, New York 11791